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October 23, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Nina R. Morrison, U.S.D.J.
225 Cadman Plaza East
Courtroom 6E North
Brooklyn, NY 11201-1804

Re: Paccha v. APS Electric, Inc., et al.
Case No.: 1:23-cv-2075 (NRM) (MMH)

Dear Judge Morrison:

This firm is represents the Defendants in this case. Defendants respectfully submit this letter to request an adjournment of the evidentiary hearing currently scheduled to proceed on Thursday, November 14, 2024 at 11:00 AM.

Pursuant to ¶ 1.7 of this Court's Individual Practice Rules, Defendants respectfully submit that:

(i) the reason for the request is because your undersigned will be out of the country for a close family member's destination wedding from Wednesday, November 13, 2024 through Friday, November 15, 2024;¹

(ii) the original date of the hearing is set forth above;

(iii-iv) there have been no previous requests for adjournments or extensions of this scheduled hearing;

(v) Plaintiff consents; and

(vi) the parties have met-and-conferred, and propose the following alternative dates:

(a) November 21, 2024;

(b) January 16, 2025; and

(c) January 23, 2025.

Defendants thank this Court for its time and attention to this case.

¹ Regrettably, this social engagement was not memorialized in your undersigned's calendar and only recently came to his attention when planning travel for same.

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Dated: Jamaica, New York
October 23, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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